

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

NO.

**VERIFIED COMPLAINT FOR  
FORFEITURE *IN REM***

\$436,924.86 IN UNITED STATES FUNDS  
SEIZED FROM NORTHERN TRUST  
INTERNATIONAL BANK CORPORATION  
ACCOUNT NUMBER XXXXXXXXX0230  
ON BEHALF OF "THAMES POINT  
MANAGEMENT, LTD.";

\$90,925.19 IN UNITED STATES FUNDS  
SEIZED FROM NORTHERN TRUST  
INTERNATIONAL BANK CORPORATION  
ACCOUNT NUMBER XXXXXXXXX0230  
ON BEHALF OF "THAMES POINT  
MANAGEMENT, LTD.";

\$1,921,766.22 IN UNITED STATES FUNDS  
SEIZED FROM BANK OF AMERICA  
ACCOUNT NUMBER XXXXXX1076 ON  
BEHALF OF "THAMES POINT  
MANAGEMENT, LTD.";

\$311,071.88 IN UNITED STATES FUNDS  
SEIZED FROM BANK OF  
AMERICA ACCOUNT NUMBER  
XXXXXXX1076 ON BEHALF OF "THAMES  
POINT MANAGEMENT, LTD.";

VERIFIED COMPLAINT FOR FORFEITURE *IN REM* - 1  
*U.S. v. \$436,924.86 in U.S. Funds, et al.*

UNITED STATES ATTORNEY  
700 STEWART STREET, SUITE 5220  
SEATTLE, WASHINGTON 98101  
(206) 553-7970

1 \$569,090.62 IN UNITED STATES FUNDS  
 2 SEIZED FROM WELLS  
 3 FARGO/WACHOVIA BANK ACCOUNT  
 4 NUMBERS XXX-XXXXXXXXXX0008,  
 5 XXXXXXXXXXXXXXX9425,  
 6 XXXXXXXXXXXXXXX0008, AND  
 7 XXXXXXXXXXXXXXX7878 ON BEHALF OF  
 8 "THAMES POINT MANAGEMENT, LTD.";

9 \$69,943.66 IN UNITED STATES FUNDS  
 10 SEIZED FROM WELLS  
 11 FARGO/WACHOVIA BANK ACCOUNT  
 12 NUMBERS XXX-XXXXXXXXXX0008,  
 13 XXXXXXXXXXXXXXX9425,  
 14 XXXXXXXXXXXXXXX0008, AND  
 15 XXXXXXXXXXXXXXX7878, ON BEHALF OF  
 16 "THAMES POINT MANAGEMENT, LTD.";

17 \$850.00 IN UNITED STATES FUNDS  
 18 SEIZED FROM WELLS  
 19 FARGO/WACHOVIA BANK ACCOUNT  
 20 NUMBERS XXX-XXXXXXXXXX0008,  
 21 XXXXXXXXXXXXXXX9425,  
 22 XXXXXXXXXXXXXXX0008, AND  
 23 XXXXXXXXXXXXXXX7878 ON BEHALF OF  
 24 "THAMES POINT MANAGEMENT, LTD.";

25 Defendants.

26 COMES NOW Plaintiff United States of America, by and through Annette L.  
 27 Hayes, Acting United States Attorney for the Western District of Washington, and Lisca  
 28 N. Borichewski and Richard E. Cohen, Assistant United States Attorneys for said  
 District, and alleges:

### 29 I. NATURE OF THE ACTION

30 1. This is a Complaint for forfeiture *in rem* pursuant to 18 U.S.C. §  
 31 981(a)(1)(A) of the following funds (collectively, "Defendant Funds"), which were  
 32 involved in or traceable to international money laundering violations of 18 U.S.C. §  
 33 1956(a)(2)(A), and/or pursuant to 18 U.S.C. § 981(a)(1)(C) as property constituting or  
 34 derived from proceeds traceable to illegal gambling business(es) in violation of  
 35 18 U.S.C. §§ 1084(a) and 1952(a), which are "Specified Unlawful Activities" ("SUAs")  
 36 as incorporated by 18 U.S.C. § 1956(c)(7)(A):

37 VERIFIED COMPLAINT FOR FORFEITURE *IN REM* - 2  
 38 U.S. v. \$436,924.86 in U.S. Funds, et al.

UNITED STATES ATTORNEY  
 700 STEWART STREET, SUITE 5220  
 SEATTLE, WASHINGTON 98101  
 (206) 553-7970

- 1 A. \$436,924.86 in UNITED STATES FUNDS, more or less, and all proceeds  
 2 therefrom, seized on July 20, 2011 pursuant to federal seizure warrant  
 3 MS11-115, representing all wires seized from Northern Trust International  
 4 Bank Corporation Account Number XXXXXXXXX0230, on behalf of  
 "Thames Point Management, LTD.";
- 5 B. \$90,925.19 in UNITED STATES FUNDS, more or less, and all proceeds  
 6 therefrom, seized on August 2, 2011 pursuant to federal seizure warrant  
 7 MC11-123, representing all wires seized from Northern Trust International  
 8 Bank Corporation Account Number XXXXXXXXX0230, on behalf of  
 "Thames Point Management, LTD.";
- 9 C. \$1,921,766.22 in UNITED STATES FUNDS, more or less, and all  
 10 proceeds therefrom, seized on July 19, 2011 pursuant to federal seizure  
 11 warrant MS11-114, representing all wires seized from Bank of America  
 12 Account Number XXXXXX1076, on behalf of "Thames Point  
 Management, LTD.";
- 13 D. \$311,071.88 in UNITED STATES FUNDS, more or less, and all proceeds  
 14 therefrom, seized on August 2, 2011 pursuant to federal seizure warrant  
 15 MS11-125, representing all wires seized from Bank of America Account  
 Number XXXXXX1076, on behalf of "Thames Point Management, LTD.";
- 16 E. \$569,090.62 in UNITED STATES FUNDS, more or less, and all proceeds  
 17 therefrom, seized on August 2, 2011 pursuant to federal seizure warrant  
 18 MS11-117, representing all wires seized from Wells Fargo/Wachovia Bank  
 19 Account Numbers XXX-XXXXXXXXXX0008, XXXXXXXXXXXXXXX9425,  
 20 XXXXXXXXXXXXXXX0008, and XXXXXXXXXXXXXXX7878, on behalf of  
 "Thames Point Management, LTD.";
- 21 F. \$69,943.66 in UNITED STATES FUNDS, more or less, and all proceeds  
 22 therefrom, seized on July 22, 2011 pursuant to federal seizure warrant  
 23 MS11-117, representing all wires seized from Wells Fargo/Wachovia Bank  
 24 Account Numbers XXX-XXXXXXXXXX0008, XXXXXXXXXXXXXXX9425,  
 25 XXXXXXXXXXXXXXX0008, and XXXXXXXXXXXXXXX7878, on behalf of  
 "Thames Point Management, LTD.;" and

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G. \$850.00 in UNITED STATES FUNDS, more or less, and all proceeds therefrom, seized on August 2, 2011 pursuant to federal seizure warrant MS11-124, representing all wires seized from Wells Fargo/Wachovia Bank Account Numbers XXX-XXXXXXXXXX0008, XXXXXXXXXXXXXXX9425, XXXXXXXXXXXXXXX0008, and XXXXXXXXXXXXXXX7878, on behalf of "Thames Point Management, LTD."

## II. JURISDICTION AND VENUE

2. This Court has jurisdiction over this action under 28 U.S.C. §§ 1345 and 1355(a).

3. This Court has venue over this action pursuant to 28 U.S.C. §§ 1355(b)(1)(A) and 1395.

## III. DEFENDANT PROPERTY

4. The Defendant Funds are now, and during the pendency of this action will be, within the jurisdiction of this Court.

## IV. FACTUAL BASIS FOR FORFEITURE

### A. Background: Online Gambling.

5. The online gambling industry is essentially a virtual casino. The websites, which include [www.bodog.com](http://www.bodog.com) and [www.betus.com](http://www.betus.com), act as the casinos and are located on computer servers all over the world. Similarly, the gamblers are also located all over the world. As long as a person has access to the internet, and the gambling site will accept their money, that person can gamble online.

6. However, federal law prohibits interstate and foreign travel or transportation in aid of racketeering enterprises pursuant to 18 U.S.C. § 1952(a). Specifically prohibited is the use of the mail or any facility in interstate or foreign commerce with the intent to distribute the proceeds of any unlawful activity or to otherwise promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of any unlawful activity. The definition of "unlawful activity" specifically includes "any business enterprise involving gambling." 18 U.S.C. § 1952(b). 18 U.S.C. § 1952(a) is a Specified Unlawful Activity underlying international

1 money laundering violations pursuant to 18 U.S.C. § 1956(a)(2)(A). Racketeering  
 2 activity is defined as any act, including gambling, that is chargeable under state law and  
 3 punishable by imprisonment for more than one year (i.e., a felony). *See* 18 U.S.C. §  
 4 1961(1)(A). In the state of Washington, online gambling is a felony offense:

5           Whoever knowingly transmits or receives gambling information  
 6           by...the internet, a telecommunications transmission system, or similar  
 7           means, or knowingly installs or maintains equipment for the  
 8           transmission or receipt of gambling information shall be guilty of a  
           class C felony subject to the penalty set forth in RCW 9A.20.021.

9 R.C.W. § 9.46.240. In Washington, violations of R.C.W. § 9.46.240, as set forth above,  
 10 are class C felonies punishable by a maximum sentence of confinement in a state  
 11 correctional institution for five years, or by fine. *See* R.C.W. § 9A.20.021(c); *see also*  
 12 *Rousso v. State*, 239 P.3d 1084 (Wash. 2010) (ban on internet gambling in state of  
 13 Washington not an excessive burden on interstate commerce, and therefore did not  
 14 violate the dormant Commerce Clause). Therefore, Washington state gambling  
 15 violations are also Specified Unlawful Activities in aid of racketeering enterprises  
 16 underlying international money laundering violations.

17         7. There are different types of online gambling, including sports wagering.  
 18 However, federal law prohibits transmission of wagering information. Specifically,  
 19 pursuant to 18 U.S.C. § 1084(a), it is illegal to use wire communications for the  
 20 transmission in interstate or foreign commerce of bets or wagers, or information assisting  
 21 in the placing of bets or wagers, on any sporting event. Additionally, it is illegal to  
 22 transmit a wire communication that entitles the recipient to receive money or credit as a  
 23 result of bets or wagers, or for information assisting in the placing of bets or wagers.  
 24 Though 18 U.S.C. § 1084(b) specifically allows the transmission of wire communications  
 25 in interstate or foreign commerce for the purpose of placing bets or wagers (i.e., if the  
 26 transmission occurs between two states or other foreign entities where such activity is  
 27 legal), online gaming is illegal in the state of Washington, as provided above. *See*  
 28 R.C.W. § 9.46.240. Therefore, any interstate wire communications that occur in

1 Washington for the purpose of sports gambling are also a violation of federal law. In  
2 addition, 18 U.S.C. § 1084 is a racketeering predicate act under 18 U.S.C. § 1961(1)(B)  
3 and, as such, is also a Specified Unlawful Activity underlying international money  
4 laundering violations. *See* 18 U.S.C. § 1956(c)(7)(A).

5 8. An individual seeking to gamble over the internet must create and fund an  
6 account with the online casino. This is done by first creating the casino account online  
7 (similar to signing up for an email account) and then funding that casino account. There  
8 are various methods of funding casino accounts: by credit card or debit card entered  
9 directly on the gaming website or via third party payment processors. Every credit card  
10 transaction has a 4-digit code tied to the transaction type, which is incriminating if  
11 associated with online gambling. Therefore, individual gamblers who want to make bets  
12 online must find ways to do so without having identifying information on the associated  
13 electronic transfer. As such, individual gamblers hire third party payment processors to  
14 make electronic transfers when both paying into the online gambling site and when  
15 seeking pay-out of their winnings. These third party transfers are often sent overseas, and  
16 the receiving party is frequently not the name of the online casino.

17 9. After the individual deposits money into his or her online casino account or  
18 third party account, that credit will be posted online, and the individual player can begin  
19 to wager. The player can also withdraw or "cashout" from their online casino account.  
20 This disbursement of funds can take the form of checks mailed to the individual player or  
21 wire transfers received directly into the bank account of the online gambler.

22 **B. Thames Point Management, LTD. and Royal Bank of Scotland.**

23 10. In the spring of 2011, a detective employed by the Seattle Police  
24 Department, using an undercover identity and based in the Western District of  
25 Washington, opened an online gambling account with the website [www.betus.com](http://www.betus.com). The  
26 undercover officer funded his gambling account by sending a Western Union wire  
27 transfer to an individual located in the Philippines as directed by [www.betus.com](http://www.betus.com). The  
28 undercover officer used the website to wager on sporting events numerous times.



11. In May 2011, the undercover officer logged into his account at [www.betus.com](http://www.betus.com) and placed a request for payout from the website as a result of this betting. As part of this process, the undercover officer was instructed to complete an online banking form which requested that the undercover officer provide his bank account information—including the international banking code for his bank. The undercover officer received a wire in the amount of more than \$100.00 directly into his bank account. The wire details showed the originating bank as The Royal Bank of Scotland, located in London, United Kingdom. The wire further reflected that the funds were transferred from the Royal Bank of Scotland bank account of Thames Point Management, LTD., also located in London, United Kingdom (“TPM” or “Thames Point”).

12. The wire documentation showed that the funds, which represent the online gambling payout to the undercover officer, were routed through a “correspondent bank account” located in the United States that the Royal Bank of Scotland (“RBS”) utilized to convert the funds from foreign currency to U.S. currency. When making foreign transfers/transactions to individual bank accounts, RBS routinely used set “correspondent bank accounts” like the above-captioned accounts, which are used primarily to exchange foreign currency into U.S. currency. This process happens almost immediately and the transferred funds do not reside in the “correspondent bank accounts” for very long before the funds are then ultimately transferred to individual bank accounts—as set forth in further detail below. Therefore, TPM facilitated the transfer of illegal gambling funds from the United Kingdom to the U.S. for distribution into the U.S. bank accounts of illegal online gamblers: TPM utilized its bank account at RBS and, subsequently, RBS’s “correspondent bank accounts” to transfer funds to and from individual bank accounts, including those located in the Western District of Washington, thereby bypassing the online gambling sites.

13. More specifically, TPM is a third party payment processor on behalf of gambling websites, including [www.bodog.com](http://www.bodog.com) and [www.betus.com](http://www.betus.com). TPM provided

1 RBS with individual bank account information, including the name of the banking  
 2 institutions and bank routing numbers. In exchange, TPM received a fee for each  
 3 transfer. The individual bank account holders then participated in illegal gambling  
 4 activity hosted by illegal, online gambling websites.

5 14. On June 30, 2011, Will Marik, a detective with the King County Sheriff's  
 6 Office, Shoreline Police Department, and a United States Secret Service Task Force  
 7 Officer ("Detective Marik"), conducted a search for TPM with the United States  
 8 Treasury. The search revealed that Thames Point Management, LTD was not a licensed  
 9 money transmitter with the Financial Crimes Enforcement Network ("FINCEN").  
 10 Additionally, the Washington State Department of Financial Investigations revealed that  
 11 TPM is not licensed as a money transmitter in the state of Washington.

12 15. Additionally, Detective Marik conducted a computer search for Thames  
 13 Point Management, LTD on June 30, 2011. A website belonging to the entity could not  
 14 be found. However, a website identified as [www.gpwa.org](http://www.gpwa.org) referred to Thames Point  
 15 Management in the context of online gambling. The initials GPWA in the website,  
 16 [www.gpwa.org](http://www.gpwa.org), are an acronym for the "Gambling Portal Webmaster Association." The  
 17 website [www.gpwa.org](http://www.gpwa.org) is a forum for individuals participating in online gambling to post  
 18 blogs or messages related to current online gambling issues. On this website, an  
 19 individual using the name "balagan9" and "Sandra" posted a message that she received a  
 20 payment from Thames Point, and she inquired if anyone else on the website had  
 21 information about this company. "Blagan9/Sandra" then posted an updated message that  
 22 she received a wire payment from Thames Point after gambling on [www.betus.com](http://www.betus.com).

### 23 **C. International Wire Transfers and Correspondent Bank Accounts**

24 16. The international wire transfer of money often involves multiple steps  
 25 between the initiation of the transfer in one country and the actual receipt of funds by an  
 26 individual in another country. When a foreign bank sends an electronic payment to the  
 27 United States on behalf of their account holder, the foreign bank enlists the services of a  
 28 United States bank with whom the foreign bank maintains a "correspondent bank



1 account.” As provided above, these correspondent bank accounts exist primarily to  
2 facilitate the conversion of foreign currency between banks, and are usually offered by  
3 large banks based in the U.S. that conduct business overseas. These correspondent  
4 accounts are offered to foreign banks that wish to conduct business and transfer funds  
5 into the U.S. banking system. Once the funds are transferred into a U.S. correspondent  
6 bank account, the funds are converted to U.S. dollars and can be immediately forwarded  
7 to numerous other U.S. bank customer accounts at different banks. Correspondent bank  
8 accounts are specific to each foreign banking customer. Therefore, for example, a Royal  
9 Bank of Scotland correspondent bank account at Wells Fargo Bank in the U.S. can only  
10 be used for Royal Bank of Scotland business.

11 17. In making an international transfer of funds, the foreign bank transmits  
12 funds to a “correspondent bank account” maintained by banks in the United States, where  
13 the funds are converted from the foreign currency to U.S. currency. At this point, the  
14 money resides within the U.S. banking system. The money is then forwarded to the  
15 individual recipient U.S. bank accounts via the Federal Reserve Wire Transfer System  
16 (FRWTS) or the Clearing House Interbank Payments System (CHIPS) wire transfer  
17 system. Therefore, the “correspondent bank account” does not hold any actual funds.  
18 Rather, the funds are quickly, almost instantaneously, converted to U.S. currency and  
19 then forwarded to their final destination in the United States.

20 18. As provided above, Thames Point acted as a money processor on behalf of  
21 gambling websites that include www.bodog.com and www.betus.com. Specifically,  
22 Thames Point used the “correspondent bank accounts” set forth below to facilitate the  
23 transfer of illegal gambling funds from the United Kingdom to the U.S. for distribution  
24 into the U.S. bank accounts of online gamblers.

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19. The "correspondent bank accounts" include the following:

- A. Northern Trust International Bank Corporation account number XXXXXXXX0230, located at Harborside Financial Center Plaza 3, Second Street, Suite 1400, Jersey City, New Jersey;
- B. Bank of America account number XXXXXX1076 located at 5701 Horatio Street, Utica, New York; and
- C. Wells Fargo Bank/Wachovia account numbers XXX-XXXXXXXXXX0008, XXXXXXXXXXXXXXX9425, XXXXXXXXXXXXXXX0008, XXX-XXXXXXXXXXXX7878 located at 401 Market Street Philadelphia, Pennsylvania.

**(1) Correspondent Bank Account: Northern Trust International Bank Corporation**

20. As provided above, a Seattle Police Department detective used an undercover identity in the early 2011 to open an online gambling account with [www.betus.com](http://www.betus.com). At the direction of the website, the undercover officer funded his gambling via wire transfer and then placed numerous wagers on sporting events. In May 2011, the undercover officer requested a payout of his betting from his account at [www.betus.com](http://www.betus.com) which instructed the officer to complete an online banking form by providing his bank account information and the international banking code for his bank. The undercover officer then received a wire in the amount of more than \$100.00 directly into his bank account. The wire details showed the originating bank as RBS, which had transferred the funds from TPM's account at RBS and, further, that the payout to the undercover officer was routed through RBS's correspondent bank account at Northern Trust International Bank Corporation.

21. More specifically, banking records from Northern Trust International Bank Corporation ("Northern Trust") reflect that the funds received into the undercover bank account were transferred by TPM from RBS to a correspondent account maintained at Northern Trust in the United States. Bank records reflect the following additional

1 international wire transfers from TPM to Northern Trust correspondent bank account  
2 number XXXXXXXX0230 ("Northern Trust Correspondent Account"):

- 3 a. In February 2011, there were 446 incoming wire transfers totaling  
4 \$925,698.92. These funds were immediately transferred to 446 other  
5 bank accounts in the United States.
- 6 b. In March 2011, there were 231 incoming wire transfers totaling  
7 \$556,193.24. These funds were immediately transferred to 231 other  
8 bank accounts in the United States.
- 9 c. In April 2011, there were 413 incoming wire transfers, totaling  
10 \$949,904.23. These funds were immediately transferred to 413 other  
11 bank accounts in the United States.
- 12 d. In May 2011, there were 441 incoming wire transfers totaling  
13 \$825,681.70. These funds were immediately transferred to 441 other  
14 bank accounts in the United States.
- 15 e. In June 2011, there were 372 incoming wire transfers totaling  
16 \$744,547.15. These funds were immediately transferred to 372 other  
17 bank accounts in the United States.
- 18 f. From July 1 to July 11, 2011, there were 94 incoming wire transfers  
19 totaling \$202,541.24. These funds were immediately transferred to 94  
20 other bank accounts in the United States.

21 22. In total, between February of 2011 and July 11, 2011, TPM sent 1,997  
22 international wire transfers to the Northern Trust Correspondent Account, totaling  
23 \$4,204,566.48. These funds were immediately transferred to other United States bank  
24 accounts. Bank records revealed that individuals located in Washington received at least  
25 the following sampling of wire transfers from TPM via the Northern Trust Correspondent  
26 Account:

- 27 i. On June 30, 2011, Detective Marik and Seattle Police Department  
28 Detective Dunn ("Detective Dunn") contacted a confidential source  
named "T.B." in Tacoma, Washington. "T.B." admitted to receiving  
a wire transfer from Thames Point in the amount of \$5,000.00,  
which was deposited into "T.B.'s" Key Bank account on March 2,  
2011. The wire came from The Royal Bank of Scotland into the

United States through the Northern Trust Correspondent Account. It was then transferred directly into "T.B.'s" Key Bank account. "T.B." admitted that these funds represented payouts for online betting on sporting events at [www.betus.com](http://www.betus.com).

- ii. On July 8, 2011, Detective Marik contacted another confidential source named "L.G." in Tacoma, Washington. "L.G." admitted to receiving a wire transfer from Thames Point in the amount of \$155.00, which was deposited into "L.G.'s" bank account on May 5, 2011. The wire came from The Royal Bank of Scotland into the United States through the Northern Trust Correspondent Account, and was then transferred directly into "L.G.'s" Sterling Savings Bank account. "L.G." admitted that these funds represented payouts for online betting on sporting events at [www.betus.com](http://www.betus.com).
- iii. Detective Marik and Seattle Police Department Detective Chris Hansen ("Detective Hansen") further reviewed the international wire transfers from Thames Point that routed through the Northern Trust Correspondent Account. Between February 1, 2011 and July 2, 2011, Thames Point sent sixteen (16) additional wires, in the amount of \$16,280.08, from their Royal Bank of Scotland account to Washington State residents, at their bank accounts located in the Western District of Washington.
- iv. Detectives Marik and Hansen further reviewed the international wire transfers from Thames Point that routed through the Northern Trust Correspondent Account. Between March 1, 2011 and April 30, 2011, Thames Point sent four (4) additional wires, in the amount of \$3,285.00, from their Royal Bank of Scotland account to Washington State residents, at their bank accounts located in the Eastern District of Washington.

**(2) Correspondent Bank Account: Bank of America**

23. Information received from a confidential source indicated that TPM was also sending international wire transfers to the United States via Bank of America. Bank of America banking records revealed that TPM sent international wire transfers from RBS to Bank of America correspondent bank account number XXXXXX1076 (the "Bank of America Correspondent Account").

24. Bank records reflect the following international wire transfers from TPM to the Bank of America Correspondent Account:

- a. In February 2011, there were 293 incoming wire transfers totaling \$982,202.69. These funds were immediately transferred to 293 other accounts in the United States.
- b. In March 2011, there were 814 incoming wire transfers totaling \$2,788,096.38. These funds were immediately transferred to 814 other accounts in the United States.
- c. In April 2011, there were 1201 incoming wire transfers totaling \$3,265,003.60. These funds were immediately transferred to 1201 other accounts in the United States.
- d. In May 2011, there were 1168 incoming wire transfers totaling \$2,640,262.99. These funds were immediately transferred to 766 other accounts in the United States.
- e. In June 2011, there were 1289 incoming wire transfers totaling \$3,854,687.32. These funds were immediately transferred to 959 other accounts in the United States.
- f. From July 1, 2011 to July 5, 2011, there were 17 incoming wire transfers totaling approximately \$625,000.00. These funds were immediately transferred to 17 other accounts in the United States.

25. In total, during December 2010 to July 5, 2011, TPM sent 4780 wire transfers from their RBS account to the Bank of America Correspondent Account, totaling \$13,622,832.69, and these funds were immediately transferred to other United States bank accounts.

26. Bank records revealed that individuals located in the Western District of Washington received at least the following sampling of wire transfers from TPM via the Bank of America Correspondent Account:

- i. On July 7, 2011, Detectives Dunn and Marik contacted a confidential source named "C.B." in Kent, Washington. "C.B." admitted to receiving a wire transfer from Thames Point. The wire transfer, in the amount of \$2,500.00, was deposited into "C.B.'s" Bank of America account on May 11, 2011. The wire came from The Royal Bank of



1 Scotland into the United States through the Bank of America  
2 Correspondent Account. It was then transferred directly into "C.B.'s"  
3 Bank of America account. "C.B." admitted the funds represented  
4 payouts for playing poker online at [www.bodog.com](http://www.bodog.com).

5 ii. On July 7, 2011, Detectives Dunn and Marik contacted another  
6 confidential source named "M.S." in SeaTac, Washington. "M.S."  
7 admitted to receiving three wire transfers from Thames Point. The first  
8 wire transfer, in the amount of \$9,982.00 was deposited into "M.S.'s"  
9 Bank of America account on March 1, 2011. The second wire transfer,  
10 in the amount of \$3,000.00, was deposited into "M.S.'s" Bank of  
11 America account on April 5, 2011. The third wire transfer, in the  
12 amount of \$2,946.00, was deposited into "M.S.'s" Bank of America  
13 account on May 18, 2011. The wires came from The Royal Bank of  
14 Scotland into the United States through Bank of America Correspondent  
15 Account. They were then transferred directly into "M.S.'s" Bank of  
16 America account. "M.S." admitted that these funds represented payouts  
17 for sportsbook wagering online at [www.bodog.com](http://www.bodog.com).

18 iii. On July 7, 2011, Detectives Dunn and Marik contacted another  
19 confidential source named "D.B." in SeaTac, Washington. "D.B."  
20 admitted to receiving a wire transfer from Thames Point. The wire  
21 transfer, in the amount of \$2,500.00, was deposited into "D.B.'s" Bank  
22 of America account on June 20, 2011. The wire came from The Royal  
23 Bank of Scotland into the United States through the Bank of America  
24 Correspondent Account. It was then transferred directly into "D.B.'s"  
25 Bank of America account. "D.B." admitted that these funds represented  
26 payouts for sportsbook wagering online at [www.bodog.com](http://www.bodog.com).

27 iv. Detectives Marik and Hansen further reviewed the international wire  
28 transfers from TPM that routed through the Bank of America  
Correspondent Account. Between May 1, 2011 and July 30, 2011,  
Thames Point sent two (2) additional wires, in the amount of  
\$13,121.34, from their Royal Bank of Scotland account to Washington  
State residents, at their bank accounts located in the Western District of  
Washington.

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1     **(3) Correspondent Bank Accounts: Wells Fargo/Wachovia Bank**

2           27.     In July 2011, the United States Secret Service ("USSS") Seattle Field  
3 Office received banking records, which revealed that Thames Point also used  
4 correspondent bank accounts at Wells Fargo Bank to facilitate the distribution of funds  
5 from Europe to the United States. Based on this information, the USSS reviewed  
6 additional Wells Fargo Bank records for wire transfers conducted on behalf of TPM. As  
7 further detailed below, the banking records reflect that TPM transferred funds from RBS  
8 into the United States through the following correspondent bank accounts identified as:

- 9                   a.   Wells Fargo Bank account numbers XXX-XXXXXXXXXX0008 and  
10                   XXX-XXXXXXXXXX9425 located at 401 Market Street, Philadelphia,  
11                   Pennsylvania; and  
12                   b.   Wachovia Bank account numbers XXX-XXXXXXXXXX0008 and  
13                   XXX-XXXXXXXXXX7878 located at 401 Market Street, Philadelphia,  
14                   Pennsylvania.

15           28.     Bank records reflect the following international wire transfers by TPM  
16 from RBS to Wells Fargo/Wachovia Bank account numbers XXX-XXXXXXXXXX0008,  
17 XXX-XXXXXXXXXX9425, XXX-XXXXXXXXXX0008 and XXX-XXXXXXXXXX7878  
18 (the "Wells Fargo/Wachovia Correspondent Bank Accounts"):

- 19                   a.   In February 2011, there were 7 incoming wire transfers totaling  
20                   \$67,949.11. These funds were immediately transferred to 7 other bank  
21                   accounts in the United States.  
22                   b.   In March 2011, there were 20 incoming wire transfers totaling  
23                   \$210,820.02. These funds were immediately transferred to 20 other  
24                   bank accounts in the United States.  
25                   c.   In April 2011, there were 280 incoming wire transfers totaling  
26                   \$738,601.74. These funds were immediately transferred to 280 other  
27                   banks accounts in the United States.  
28                   d.   In May of 2011, there were 38 incoming wire transfers totaling  
                    \$162,271.50. These funds were immediately transferred to 38 other  
                    bank accounts in the United States.

1 e. In June 2011, there were 222 incoming wire transfers totaling  
2 \$553,041.95. These funds were immediately transferred to 222 other  
3 bank accounts in the United States.

4 f. From July 1 to July 13, 2011, there were 111 incoming wire transfers  
5 totaling \$224,240.36. These funds were immediately transferred to 111  
6 other bank accounts in the United States.

7 29. In total, during February 17, 2011 to July 13, 2011, TPM sent 660  
8 international wire transfers to the Wells Fargo/Wachovia Correspondent Bank Accounts  
9 totaling \$1,957,024.62.

10 30. Bank records revealed that individuals located in the Western District of  
11 Washington received at least the following sampling of wire transfers from TPM via the  
12 Wells Fargo/Wachovia Correspondent Bank Accounts:

13 i. On July 20, 2011, Detective Marik contacted a confidential source  
14 named "M.B." in Redmond, Washington. "M.B." admitted to  
15 receiving a wire transfer from Thames Point. The wire transfer, in  
16 the amount of \$3,203.00, was deposited into "M.B.'s" Wells Fargo  
17 account on April 8, 2011. The wire came from The Royal Bank of  
18 Scotland into the United States through Wells Fargo correspondent  
19 bank account number XXX-XXXXXXXXXX9425. It was then  
20 transferred directly into "M.B.'s" Wells Fargo Bank account.  
21 "M.B." admitted that these funds represented payouts for online  
22 betting on sporting events at www.bodog.com.

23 ii. On July 20, 2011, Detectives Dunn and Marik contacted another  
24 confidential source named "A.H." in Renton, Washington. "A.H."  
25 admitted to receiving a wire transfer from Thames Point. The wire  
26 transfer, in the amount of \$660.00, was deposited into "A.H.'s" bank  
27 account on April 13, 2011. The wire came from The Royal Bank of  
28 Scotland into the United States through Wells Fargo correspondent  
bank account number XXX-XXXXXXXXXX9425. It was transferred  
directly into "A.H.'s" Wells Fargo Bank account. "A.H." admitted  
these funds represented payouts for online betting on sporting events  
at www.betus.com.

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iii. Detectives Marik and Hansen further reviewed the international wire transfers from TPM that routed through the Wells Fargo correspondent bank account numbers XXX-XXXXXXXXXX9425 and XXX-XXXXXXXXXX0008. Between May 1, 2011 and June 30, 2011, Thames Point sent seven (7) additional wires, in the amount of \$30,312.53, from their Royal Bank of Scotland account to Washington State residents, at their bank accounts located in the Western District of Washington.

31. Based on the foregoing, TPM has utilized the “correspondent bank accounts” identified herein, committed, and aided and abetted in the transmission of wagering information and international money laundering in violation of 18 U.S.C. § 1084(a) and 18 U.S.C. §§ 1956(a)(1)(A)(i) and 1956(a)(2)(a). As such, the Defendant Funds are subject to forfeiture to the United States.

#### V. LEGAL BASIS FOR FORFEITURE

32. By reason of the foregoing, there is probable cause to believe that the above-captioned Defendant Funds are property involved in or traceable to international money laundering in violation of 18 U.S.C. § 1956(a)(2)(A), and therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A); and/or are property constituting or derived from proceeds of illegal gambling in violation of 18 U.S.C. §§ 1084(a) and 1952(a), as incorporated by 18 U.S.C. § 1956(c)(7)(A), and therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C). As such, the funds contained in the following accounts are subject to forfeiture to the United States:

- a. \$436,924.86 in UNITED STATES FUNDS that were seized from Northern Trust International Bank Corporation Account Number XXXXXXXXX0230 on behalf of “Thames Point Management, LTD.”;
- b. \$90,925.19 in UNITED STATES FUNDS that were seized from Northern Trust International Bank Corporation Account Number XXXXXXXXX0230 on behalf of “Thames Point Management, LTD.”;
- c. \$1,921,766.22 in UNITED STATES FUNDS that were seized from Bank of America Account Number XXXXXX1076 on behalf of “Thames Point Management, LTD.”;

- 1
- 2 d. \$311,071.88 in UNITED STATES FUNDS that were seized from Bank
- 3 of America Account Number XXXXXX1076, on behalf of "Thames
- 4 Point Management, LTD.";
- 5 e. \$569,090.62 in UNITED STATES FUNDS that were seized from Wells
- 6 Fargo/Wachovia Bank Account Numbers XXX-XXXXXXXXXX0008,
- 7 XXXXXXXXXXXXXXX9425, XXXXXXXXXXXXXXX0008, and
- 8 XXXXXXXXXXXXXXX7878, on behalf of "Thames Point Management,
- 9 LTD.";
- 10 f. \$69,943.66 in UNITED STATES FUNDS that were seized from Wells
- 11 Fargo/Wachovia Bank Account Numbers XXX-XXXXXXXXXX0008,
- 12 XXXXXXXXXXXXXXX9425, XXXXXXXXXXXXXXX0008, and
- 13 XXXXXXXXXXXXXXX7878, on behalf of "Thames Point Management,
- 14 LTD.;" and
- 15 g. \$850.00 in UNITED STATES FUNDS that were seized from Wells
- 16 Fargo/Wachovia Bank Account Numbers XXX-XXXXXXXXXX0008,
- 17 XXXXXXXXXXXXXXX9425, XXXXXXXXXXXXXXX0008, and
- 18 XXXXXXXXXXXXXXX7878, on behalf of "Thames Point Management,
- 19 LTD."

20 WHEREFORE, the United States requests as follows: That due process issue to

21 enforce the forfeiture of the Defendant Funds; that due notice be given to all interested

22 persons to appear and to show cause why forfeiture of the Defendant Funds should not be

23 decreed; that judgment be entered declaring the Defendant Funds forfeited to the United

24 States to be disposed of according to law; that the Court thereafter order the United States

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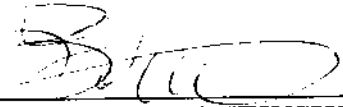
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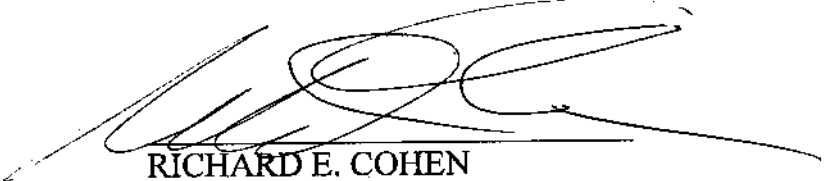
1 Secret Service, or its contractor, to dispose of the Defendant Funds as provided by law;  
2 that the Defendant Funds be condemned as forfeited to the United States to be disposed  
3 of according to law; and that the United States be granted such other and further relief as  
4 the Court may deem just and proper.

5 DATED this 23<sup>d</sup> day of December, 2014.

6 Respectfully submitted,

7  
8 ANNETTE L. HAYES  
9 Acting United States Attorney

10   
11 LISCA BORICHEWSKI  
12 Assistant United States Attorney  
13 United States Attorney's Office  
14 700 Stewart Street, Suite 5220  
15 Seattle, Washington 98101-1271  
16 Phone: 206-553-2266  
17 Email: [Lisca.Borichewski@usdoj.gov](mailto:Lisca.Borichewski@usdoj.gov)

18   
19 RICHARD E. COHEN  
20 Assistant United States Attorney  
21 United States Attorney's Office  
22 700 Stewart Street, Suite 5220  
23 Seattle, Washington 98101-1271  
24 Phone: 206-553-4665  
25 Fax: 206-553-6934  
26 Email: [Richard.E.Cohen@usdoj.gov](mailto:Richard.E.Cohen@usdoj.gov)

VERIFICATION OF COMPLAINT

STATE OF WASHINGTON )  
 ) ss  
COUNTY OF )

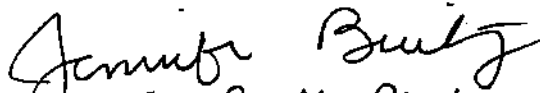
I, William Marik, declare under penalty of perjury that the following is true and correct to the best of my knowledge:

I am a Detective with the King County Sheriff's Office, Shoreline Police Department, and a United States Secret Service Task Force Officer and have knowledge of this case. I have read the foregoing complaint and know the concerns thereof. I have furnished the information contained in the complaint based upon my involvement in the matter and that of other reliable Government sources and based on information and belief, the allegations contained in the complaint are true.



WILLIAM MARIK  
Detective, King County Sheriff's Office  
Shoreline Police Department  
United States Secret Service Task Force Officer

SUBSCRIBED and SWORN to before me this 22<sup>nd</sup> day of December, 2014, by William Marik.



Print: Jennifer M. Biretz  
Notary Public in and for the  
State of Washington, residing  
at Seattle, King Co.  
Expires: 7/4/15